

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

NOV 18 2020

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

JULIA C. DUDLEY, CLERK
BY:  DEPUTY CLERK

UNITED STATES OF AMERICA
v.
DOMINIQUE DEJONE THURSTON

Case No. 3:20CR00025

In violation of: 18 U.S.C. § 1951(a)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 922(g)(1)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

18 U.S.C. § 1951(a)

(Hobbs Act Robbery of the Oak Hill Market, Albemarle County, Virginia)

1. At all times material to this Indictment, the Oak Hill Market, located in Albemarle County, Virginia, was engaged in commercial activities in interstate commerce and an industry that affects interstate commerce.

2. On or about June 18, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain United States currency from the cash registers controlled by the employees of the Oak Hill Market located at 667 Country Green Road,

Charlottesville, Virginia, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their persons and property in their custody and possession, that is the defendant used, carried, displayed, possessed, brandished, and pointed a firearm at the store employees, and demanded the cash from the registers.

3. All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

18 U.S.C. § 924(c)

(Use of Firearm in the Commission of the
Hobbs Act Robbery of the Oak Hill Market, Albemarle County, Virginia)

4. On or about June 18, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count One of this Indictment.

5. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

18 U.S.C. § 1951(a)

(Hobbs Act Robbery of 7-11 – Ivy Road, City of Charlottesville, Virginia)

6. At all times material to this Indictment, the 7-11 located on Ivy Road in the City of Charlottesville, Virginia, was engaged in commercial activities in interstate commerce and an industry that affects interstate commerce.

7. On or about June 27, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by

robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain United States currency and other goods from the store cash registers shelves, and safe controlled by the employees of the 7-11 store located at 2025 Ivy Road, Charlottesville, Virginia, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their persons and property in their custody and possession, that is the defendant used, carried, displayed, possessed, brandished and pointed a firearm at the store employees, and demanded the cash and other goods.

8. All in violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

18 U.S.C. § 924(c)

(Use of Firearm in the Commission of the
Hobbs Act Robbery of the 7-11 – Ivy Road, City of Charlottesville, Virginia)

9. On or about June 27, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count Three of this Indictment.

10. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

18 U.S.C. § 1951(a)

(Hobbs Act Robbery of the BP Gas Station, City of Charlottesville, Virginia)

11. At all times material to this Indictment, the BP Gas Station located on Monticello Avenue in the City of Charlottesville, Virginia was engaged in commercial activities in interstate commerce and an industry that affects interstate commerce.

12. On or about July 30, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain United States currency from the restaurant registers and safe controlled by the employees of the BP Gas Station, located at 1800 Monticello Avenue, Charlottesville, Virginia, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their persons and property in their custody and possession, that is the defendant used, carried, displayed, possessed, brandished, and pointed a firearm at the restaurant employees, and demanded the cash from the registers and the restaurant safe.

13. All in violation of Title 18, United States Code, Section 1951(a).

COUNT SIX

18 U.S.C. § 924(c)

(Use of Firearm in the Commission of the
Hobbs Act Robbery of the BP Gas Station, City of Charlottesville, Virginia)

14. On or about July 30, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did knowingly use, carry, and brandish a firearm during

and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count Five of this Indictment.

15. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVEN

18 U.S.C. § 1951(a)

(Hobbs Act Robbery of the 7-11 – Greenbrier Drive, Albemarle County, Virginia)

16. At all times material to this Indictment, the 7-11 on Greenbrier Drive in Albemarle County, Virginia was engaged in commercial activities in interstate commerce and an industry that affects interstate commerce.

17. On or about August 14, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain United States currency and other goods from the store cash registers and shelves controlled by an employee of the 7-11, located at 1385 Greenbrier Dr., Charlottesville, Virginia, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property in his custody and possession, that is the defendant used, carried, displayed, possessed, brandished and pointed a firearm at the store employee, and demanded cash and other goods.

18. All in violation of Title 18, United States Code, Section 1951(a).

COUNT EIGHT

18 U.S.C. § 924(c)

(Use of Firearm in the Commission of the
Hobbs Act Robbery of the 7-11 – Greenbrier Drive, Albemarle County, Virginia)

19. On or about August 14, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count Seven of this Indictment.

20. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT NINE

18 U.S.C. § 1951(a)

(Hobbs Act Robbery of the Kangaroo Gas Station, Albemarle County, Virginia)

21. At all times material to this Indictment, Kangaroo Gas Station, located in Albemarle County, Virginia, was engaged in commercial activities in interstate commerce and an industry that affects interstate commerce.

22. On or about August 31, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain United States currency and other goods from the store cash registers, safe, and shelves controlled by employees of the Kangaroo Gas Station located at 1099 E. Rio Road, Charlottesville, Virginia, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their persons and property in

their custody and possession, that is the defendant used, carried, displayed, possessed, brandished, and pointed a firearm at the store employees, and demanded cash and other goods.

23. All in violation of Title 18, United States Code, Section 1951(a).

COUNT TEN

18 U.S.C. § 924(c)

(Use of Firearm in the Commission of the
Hobbs Act Robbery of the Kangaroo Gas Station, Albemarle County, Virginia)

24. On or about August 31, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count Nine of this Indictment.

25. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT ELEVEN

18 U.S.C. § 1951(a)

(Hobbs Act Robbery of the 7-Day Junior Store, City of Charlottesville, Virginia)

26. At all times material to this Indictment, the 7-Day Junior store, located in the City of Charlottesville, Virginia, was engaged in commercial activities in interstate commerce and an industry that affects interstate commerce.

27. On or about September 4, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did unlawfully obstruct, delay, and affect and attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the

defendant did unlawfully take and obtain United States currency from the store cash registers and the safe controlled by employees of the 7-Day Junior store located at 111 Maury Avenue, Charlottesville, Virginia, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their persons and property in their custody and possession, that is the defendant used, carried, displayed, possessed, brandished, and pointed a firearm at the store employees, and demanded cash and other goods.

28. All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWELVE

18 U.S.C. § 924(c)

(Use of Firearm in the Commission of the
Hobbs Act Robbery of the 7-Day Junior Store, City of Charlottesville, Virginia)

29. On or about September 4, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count Eleven of this Indictment.

30. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THIRTEEN

18 U.S.C. § 1951(a)

(Hobbs Act Robbery of the 7-11 – Boulderview Road, Albemarle County, Virginia)

31. At all times material to this Indictment, the 7-11 store located on Boulderview Road in Albemarle County, Virginia, was engaged in commercial activities in interstate commerce and an industry that affects interstate commerce.

32. On or about September 17, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did unlawfully obstruct, delay, and affect and

attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain United States currency from the store cash registers and the safe controlled by employees of the 7-11 store located at 1915 Boulderview Road, Charlottesville, Virginia, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their persons and property in their custody and possession, that is the defendant used, carried, displayed, possessed, brandished, and pointed a firearm at the store employees, and demanded cash and other goods.

33. All in violation of Title 18, United States Code, Section 1951(a).

COUNT FOURTEEN

18 U.S.C. § 924(c)

(Use of Firearm in the Commission of the
Hobbs Act Robbery of the 7-11 Store – Boulderview Road, Albemarle County, Virginia)

34. On or about September 17, 2020, in the Western District of Virginia, the defendant DOMINIQUE DEJONE THURSTON did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery in violation of Title 18, United States Code, Section 1951, as set forth in Count Thirteen of this Indictment.

35. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIFTEEN

18 U.S.C. § 922(g)(1) and 924(a)(2)
(Felon in Possession of a Firearm)

36. On or about September 17, 2020, in the Western District of Virginia, the defendant, DOMINIQUE DEJONE THURSTON, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, that is, a Model: Phoenix Arms silver pistol, said firearm having been shipped and transported in interstate commerce.

37. All in violation of Title 18, United States Code, Sections 922(g)(1).

NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendant(s) shall forfeit to the United States:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to 21 U.S.C. § 853(a)(1).
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to 21 U.S.C. § 853(a)(2).
- c. any firearm used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances and/or raw materials, as described in 21 U.S.C. § 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to 21 U.S.C. § 881(a)(11) and 28 U.S.C. § 2461(c).
- d. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).


2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL, this 18 day of November 2020.

s/ FOREPERSON
FOREPERSON


DANIEL P. BUBAR
ACTING UNITED STATES ATTORNEY